

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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JPMORGAN CHASE BANK, NATIONAL ASSOCIATION, LONDON BRANCH,	:
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Plaintiff,	:
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- against -	:
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TESLA, INC.,	:
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Defendant.	:
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WHEREAS, Plaintiff JPMorgan Chase Bank, National Association, London Branch (“JPMorgan”) and Defendant Tesla, Inc. (“Tesla,” and together with JPMorgan, the “Parties”) conferred regarding a modified case schedule after the status conference held on May 11, 2023;

WHEREAS, JPMorgan and Tesla have agreed to modify the case schedule as set forth below;

WHEREAS, the Parties previously requested an extension of these deadlines on February 24, 2023;

WHEREAS, Magistrate Judge Wang so-ordered the Parties' Stipulation and Proposed Order Regarding Case Deadlines on February 27, 2023;

ACCORDINGLY, IT IS HEREBY STIPULATED AND AGREED by and between the undersigned attorneys for the Parties that the following case deadlines shall apply:

1. **Privilege Logs.** The Parties shall exchange any supplemental privilege logs by **July 20, 2023**. The deadline for exchange of privilege logs was **April 28, 2023**.

2. **Requests for Admission.** The Parties shall serve all requests for admission by **December 15, 2023**. The current deadline for service of requests for admission is **August 4, 2023**.
3. **Fact Discovery.** All fact discovery, including depositions and third-party discovery, shall conclude by **December 15, 2023**. The current deadline for completion of fact discovery is **August 4, 2023**.
4. **Affirmative Expert Disclosures and Reports.** The Parties shall make their affirmative expert disclosures and exchange affirmative expert reports by **February 1, 2024**. The current deadline for affirmative expert disclosures and exchange of affirmative expert reports is **August 31, 2023**.
5. **Rebuttal Expert Disclosures and Rebuttal Reports.** The Parties shall make their rebuttal expert disclosures and exchange rebuttal expert reports by **March 7, 2024**. The current deadline for rebuttal expert disclosures and exchange of rebuttal expert reports is **September 29, 2023**.
6. **Reply Expert Reports.** The Parties shall exchange their reply expert reports by **March 28, 2024**. The current deadline for reply expert reports is **October 20, 2023**.
7. **Completion of Expert Discovery.** All expert discovery, including depositions, shall conclude by **April 19, 2024**. The current deadline for completion of expert discovery is **November 10, 2023**.

SO STIPULATED AND AGREED.

Dated: July 12, 2023

DAVIS POLK & WARDWELL LLP

By: /s/ Frances E. Bivens

Frances E. Bivens  
Greg D. Andres  
Sheila R. Adams  
Craig T. Cagney  
Michael V. Pucci  
450 Lexington Avenue  
New York, New York 10017  
Tel.: (212) 450-4000  
frances.bivens@davispolk.com  
greg.andres@davispolk.com  
sheila.adams@davispolk.com  
craig.cagney@davispolk.com  
michael.pucci@davispolk.com

*Attorneys for JPMorgan Chase Bank,  
National Association, London Branch*

QUINN EMANUEL URQUHART &  
SULLIVAN LLP

By: /s/ Jonathan E. Pickhardt

Jonathan E. Pickhardt  
Alex Spiro  
Jesse Bernstein  
Nathan Goralnik  
51 Madison Avenue, 22<sup>nd</sup> Floor  
New York, NY 1001  
Tel: (212) 849-7000  
jonpickhardt@quinnemanuel.com  
alexspiro@quinnemanuel.com  
jessebernstein@quinnemanuel.com  
nathangoralnik@quinnemanuel.com

*Attorneys for Defendant Tesla, Inc.*

IT IS SO ORDERED

Date: July 19, 2023



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Hon. Ona T. Wang  
United States Magistrate Judge